

Presentment Date: June 1, 2022

Objection Deadline: May 31, 2022 at 4:00 p.m. (AST)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the Commonwealth.

**AMENDED² NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING THE
FOUR HUNDRED SEVENTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) OF
THE COMMONWEALTH OF PUERTO RICO TO EMPLOYEE CLAIMS ASSERTING
LIABILITIES OWED BY ENTITIES THAT ARE NOT TITLE III
DEBTORS (ECF NO. 20043)**

PLEASE TAKE NOTICE that, on May 24, 2022, the Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), by and through the Financial Oversight and Management

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Commonwealth hereby amends the above-captioned notice of presentment, originally filed on May 19, 2022 [ECF No. 20887], to reflect that claimant Jose Onofre Ortiz Quiñones responded to the Four Hundred Seventeenth Omnibus Objection [ECF Nos. 20310 and 20381] and the Court sustained the Four Hundred Seventeenth Omnibus Objection as to Mr. Ortiz Quiñones’ Proofs of Claim Nos. 179671 and 179673 at the March 23, 2022 Omnibus Hearing.

Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Commonwealth pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),³ hereby submits a *Notice of Presentment of Proposed Order Granting the Four Hundred Seventeenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors* (the “Notice”).

PLEASE TAKE FURTHER NOTICE that, on February 4, 2022, the Commonwealth, by and through the Oversight Board, filed the *Four Hundred Seventeenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors* [ECF No. 20043] (the “Four Hundred Seventeenth Omnibus Objection”).

PLEASE TAKE FURTHER NOTICE that the Four Hundred Seventeenth Omnibus Objection was scheduled for hearing on March 23, 2022.

PLEASE TAKE FURTHER NOTICE that any party against whom the Four Hundred Seventeenth Omnibus Objection was served, or any other party to the Debtors’ Title III cases who objected to the relief sought therein, was required to file and serve a response to the Four Hundred Seventeenth Omnibus Objection with the clerk’s office of the United States District Court for the District of Puerto Rico by 4:00 p.m. (Atlantic Time) on March 7, 2022 (the “Response Deadline”).

PLEASE TAKE FURTHER NOTICE that, as set forth in Exhibit C to the Four Hundred Seventeenth Omnibus Objection, if no response was filed by the Response Deadline, the Four Hundred Seventeenth Omnibus Objection “will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3)

³ PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

in the opinion of the court, the interest of justice requires otherwise.” Ex. C to Four Hundred Seventeenth Omnibus Objection, ECF No. 20043-4, at 3.

PLEASE TAKE FURTHER NOTICE that, as of the filing of this Notice, the claimant associated with Proofs of Claim Nos. 179671 and 179673 listed on Exhibit A hereto has responded to the Four Hundred Seventeenth Omnibus Objection (the “Claims to Be Heard”) on or before the Response Deadline via either (i) ECF filing, (ii) mailing to Prime Clerk, LLC (“Prime Clerk”), (iii) mailing to counsel for the Oversight Board, or (iv) mailing to counsel for the Official Committee of Unsecured Creditors of the Commonwealth of Puerto Rico (the “UCC”) and forwarded to counsel for the Oversight Board.

PLEASE TAKE FURTHER NOTICE that, at the omnibus hearing scheduled for March 23, 2022 at 9:30 a.m. (Atlantic Time), the Commonwealth prosecuted, and the Court sustained, the Four Hundred Seventeenth Omnibus Objection as to the Claims to Be Heard.

PLEASE TAKE FURTHER NOTICE that, with the exception of the Claims to Be Heard, as of the Response Deadline, the Claimants associated with all other claims listed on Exhibit A hereto failed to respond to or otherwise oppose the Four Hundred Seventeenth Omnibus Objection (the “Claims to Be Disallowed via Notice of Presentment”).

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit B is a proposed order (the “Proposed Order”) disallowing (1) the Claims to Be Heard and (2) the Claims to Be Disallowed via Notice of Presentment.

PLEASE TAKE FURTHER NOTICE that, pursuant to Paragraph III.H of the Court’s *Sixteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 20190-1], “the presentment of a proposed order for administrative relief must be filed and served at least seven (7) calendar days before the presentment date, and Objections thereto must be filed and

served at least one (1) calendar day before the presentment date," and accordingly, unless a written objection to the Proposed Order is filed with the Court no later than **4:00 p.m. (Atlantic Time) on May 31, 2022**, the relief requested shall be deemed unopposed, and the Proposed Order may be entered without a further hearing.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these Title III cases are available (a) free of charge by visiting <https://cases.ra.kroll.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court's website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

Dated: May 24, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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